HONORABLE JOHN C. COUGHENOUR 1 2 3 4 5 6 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 7 AT SEATTLE 8 SIXTY-01 ASSOCIATION OF APARTMENT NO. 2:22-CV-01373 JCC 9 OWNERS, a Washington non-profit corporation, STIPULATED MOTION AND Plaintiff. [PROPOSED] ORDER RE 10 DISCOVERY DEADLINES 11 v. NOTE ON MOTION CALENDAR: 12 PUBLIC SERVICE INSURANCE COMPANY: July 15, 2024 et al., 13 Defendants. 14 I. STIPULATION 15 The Association and defendant Public Service Insurance Company have conferred 16 regarding the deadlines set forth in the Court's Civil Trial Scheduling Order (Dkt. # 186). The 17 parties are mediating this dispute on August 1, 2024, and agree that it makes sense to extend 18 the current discovery cutoff and to set other discovery-related deadlines. Specifically, the 19 parties request a 29-day extension of the current discovery cutoff, such that the discovery-20 related deadlines would be as follows: 21 **Event** Date 22 September 20, 2024 Last day to disclose expert witnesses/reports 23 October 11, 2024 Last day to submit expert disclosure rebuttal reports 24 STIPULATED MOTION AND ORDER RE Ashbaugh Beal LLP 20 5th AVE SUITE 3400 DISCOVERY DEADLINES - 1 EATTLE, WA 98104 206.386.5900 F. 206.344.7400 (NO. 2:22-CV-01373 JCC)

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1	November 5, 2024 Deadline to file discovery-related motions		
2	November 5, 2024 Discovery cutoff		
3	All other deadlines and dates on the Court's Civil Trial Scheduling Order (Dkt. # 186)		
4	would remain unchanged.		
5	DATED this 15th day of July, 2024.		
6	ASHBAUGH BEAL McCormick Barstow, LLP		
7	By s/ Jesse D. Miller By s/ Kevin D. Hansen By s/ Kevin D. Hansen		
8	Jesse D. Miller, WSBA #35837 Patrick Fredette, WSBA #25300 jmiller@ashbaughbeal.com patrick.fredette@mccormickbarstow.com		
9	Zachary O. McIsaac, WSBA #35833 Kevin D. Hansen, pro hac vice zmcisaac@ashbaughbeal.com kevin.hansen@mccormickbarstow.com		
10	Attorneys for Plaintiff Maria E. Valencia, pro hac vice maria.valencia@mccormickbarstow.com		
11	Nicholas H. Rasmussen, pro hac vice nrasmussen@mccormickbarstow.com		
12	Attorneys for Defendant Public Service Insurance Company		
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14			
15	II. Order		
16	IT IS SO ORDERED.		
17	DATED this 15th day of July 2024.		
18	Joh C Coghua		
19	JUDGE JOHN C. COUGHENOUR		
20	United States District Judge		
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	STIPULATED MOTION AND ORDER RE DISCOVERY DEADLINES - 2 (NO. 2:22-CV-01373 JCC) Ashbaugh Beal LLP 920 5th AVE SUITE 3400 SEATTLE, WA 98104 T.206.386.5900 F. 206.344.7400		

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1	Presented by:	
2	ASHBAUGH BEAL	McCormick Barstow, LLP
3	By <u>s/ Jesse D. Miller</u> Jesse D. Miller, WSBA #35837	By s/ Kevin D. Hansen Patrick Fredette, WSBA #25300
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5		
6	, and the second	maria.valencia@mccormickbarstow.com Nicholas H. Rasmussen, pro hac vice
7		nrasmussen@mccormickbarstow.com Attorneys for Defendant Public Service
8		Insurance Company
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STIPULATED MOTION AND ORDER RE DISCOVERY DEADLINES - 3 (NO. 2:22-CV-01373 JCC)

1	<u>Certificate of Service</u>		
2	I hereby certify that on July 15, 2024, I electronically filed the foregoing documen		
3	with the Clerk of the Court using the CM/ECF system, which will send notification of such		
4	filing to the following:		
5	Patrick Fredette patrick.fredette@mccormickbarstow.com		
6	Kevin D. Hansen kevin.hansen@mccormickbarstow.com		
7	Maria E. Valencia maria.valencia@mccormickbarstow.com		
8	Nicholas H. Rasmussen		
9	nrasmussen@mccormickbarstow.com McCormick, Barstow, Sheppard, Wayte & Carruth LLP		
10	and Emory C. Wogenstahl		
11	emory@favros.com FAIN ANDERSON VANDERHOEF ROSENDAHL O'HALLORAN SPILLANE PLLC		
12	Attorneys for Public Service Insurance Company		
13	The foregoing is true and correct to the best of my knowledge and belief.		
14	Dated this 15th day of July, 2024, at Seattle, Washington.		
15	s/ Teresa MacDonald		
	Teresa MacDonald		
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	STIPULATED MOTION AND ORDER RE Ashbaugh Beal LLP		

STIPULATED MOTION AND ORDER RE DISCOVERY DEADLINES - 4 (NO. 2:22-CV-01373 JCC) Ashbaugh Beal LLP 920 5th AVE SUITE 3400 SEATTLE, WA 98104 T.206.386.5900 F. 206.344.7400